

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (CGM)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively  
Consolidated SIPA Liquidation of Bernard L.  
Madoff Investment Securities LLC and the Chapter 7  
Estate of Bernard L. Madoff,

Plaintiff,

v.

SQUARE ONE FUND LTD.,

Defendant.

Adv. Pro. No. 10-04330 (CGM)

**STIPULATION AND ORDER  
FOR THIRD AMENDED CASE MANAGEMENT PLAN**

**WHEREAS** pursuant to Federal Rules of Civil Procedure 16 and 26, as incorporated by Bankruptcy Rules 7016 and 7026, Plaintiff Irving H. Picard (the “Trustee”), as trustee for the substantively consolidated liquidation of the business of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa, *et seq.*, and the estate of Bernard L. Madoff under chapter 7 of the United States Bankruptcy Code, 11 U.S.C. §§ 701, *et seq.*, and Defendant Square One Fund Ltd. (“Square One,” and with the Trustee, the

“Parties”), stipulated to the Case Management Plan, which was entered by this Court on July 16, 2019 (ECF No. 178);

**WHEREAS**, on August 26, 2021, this Court entered the Order Amending Case Management Plan (ECF No. 230);

**WHEREAS**, the Amended Case Management Plan ordered that all fact discovery shall be completed on or before July 29, 2022;

**WHEREAS**, on May 16, 2022, this Court signed the Stipulation and Order for Second Amended Case Management Plan (ECF No. 245) (the “Second Amended Case Management Plan”);

**WHEREAS**, the Second Amended Case Management Plan ordered that all fact discovery shall be completed on or before December 30, 2022;

**WHEREAS**, the Second Amended Case Management Plan ordered that the Parties may serve document requests under Section 2(d) of the Case Management Plan no later than November 15, 2022;

**WHEREAS**, the Second Amended Case Management Plan ordered that the Parties may serve interrogatories under Section 2(e) of the Case Management Plan no later than November 15, 2022;

**WHEREAS**, the Second Amended Case Management Plan ordered that the Parties may serve requests for admission under Section 2(f) of the Case Management Plan no later than November 15, 2022;

**WHEREAS**, the Parties seek additional time to serve document requests, interrogatories, and requests for admission;

**WHEREAS**, the Parties seek additional time to respond to document requests, interrogatories, and requests for admission;

**NOW THEREFORE**, it is ORDERED that the deadline for the Parties to:

(i) Serve document requests under Section 2(d) of the Case Management Plan shall be extended to November 25, 2022;

(ii) Serve interrogatories under Section 2(e) of the Case Management shall be extended to November 25, 2022;

(iii) Serve requests for admission under Section 2(f) of the Case Management Plan shall be extended to November 25, 2022;

(iv) Respond to document requests, interrogatories, and requests for admission shall be extended to December 30, 2022.

The Parties reserve all rights, arguments, objections, and defenses they may have, and entry into this Stipulation shall not impair or otherwise affect the Parties' right to request from the Court a further extension of time.

*[Signatures on following page]*

Dated: November 9, 2022  
New York, New York

**BAKER & HOSTETLER LLP**

By: /s/ Marco Molina  
45 Rockefeller Plaza  
New York, New York 10111  
Telephone: 212.589.4200  
Facsimile: 212.589.4201  
David J. Sheehan  
Email: dsheehan@bakerlaw.com  
Marco Molina  
Email: mmolina@bakerlaw.com  
Ganesh Krishna  
Email: gkrishna@bakerlaw.com

*Attorneys for Plaintiff Irving H. Picard,  
Trustee for the Substantively Consolidated  
SIPA Liquidation of Bernard L. Madoff  
Investment Securities LLC and the Chapter  
7 Estate of Bernard L. Madoff*

**JENNER & BLOCK LLP**

By: /s/ Richard Levin  
1155 Avenue of the Americas  
New York, New York 10036  
Telephone: 212.891.1600  
Facsimile: 212.891.1699  
Richard Levin  
rlevin@jenner.com

*Attorneys for Defendant Square One Fund Ltd.*

**Dated: November 10, 2022**  
**Poughkeepsie, New York**



/s/ Cecelia G. Morris

**Hon. Cecelia G. Morris**  
**U.S. Bankruptcy Judge**